

UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE  
JUDY A. ROBBINS  
UNITED STATES TRUSTEE  
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UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	§	
	§	
STONE CREEK VILLAGE PROPERTY	§	CASE NO. 10-54343-LMC
OWNERS ASSOCIATION, I	§	CHAPTER 11
	§	
DEBTOR	§	Hearing Date: None Requested

**AGREED MOTION FOR ENTRY OF ORDER SETTING  
DEADLINES AND GRANTING OTHER RELIEF**

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO  
YOUR INTERESTS.

IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS  
FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN  
MAY BE GRANTED WITHOUT A HEARING BEING HELD.

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO  
BE HELD.

TO THE HONORABLE LEIF M. CLARK  
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, JUDY A ROBBINS, THE UNITED STATES TRUSTEE for Region 7 ("UST"), through the undersigned counsel, pursuant to 11 U.S.C. § 1112(b), and respectfully moves for entry of an order setting deadlines and granting other relief, and represents as follows:

1. The case was commenced upon the filing of a voluntary petition on November 4, 2010 under Chapter 11. The debtor is the property owners' association for a townhome development in Boerne, Texas.

2. More than 6 1/2 months onto the case, no plan or disclosure statement has been filed in this case.

3. The UST and the debtor have now agreed to an order, uploaded with the Motion, setting deadlines for the debtor to file a plan and disclosure statement, get approval of the disclosure statement, and confirm a plan of reorganization. Pursuant to the agreed order, the debtor will file a plan on or before June 13, 2011, obtain court approval of the disclosure statement by July 25, 2011 and obtain confirmation of that plan by September 7, 2011.

4. In addition, the agreed order provides that the debtor will become current in filing monthly operating reports by June 13, 2011 and will remain current thereafter in in filing monthly operating reports and paying quarterly fees owed to the UST.

5. Finally, the debtor will provide to the UST by June 13, 2011, a bank statement showing the closing of the pre-petition bank account with Wells Fargo, a voided check from its post-petition bank account, showing the case number and the caption "debtor-in-possession," and copies of its 2007 and 2009 Form 1120-H income tax returns.

6. If the debtor fails to comply with any of the terms of the agreed order, the UST may file a certificate of non-compliance and the Court will enter an order dismissing the case without further notice and a hearing.

WHEREFORE, the UST prays that the Court enter an order setting deadlines, and for any and all further relief as is equitable and just.

Respectfully submitted,

JUDY A. ROBBINS  
UNITED STATES TRUSTEE  
REGION 7

By: /s/Kevin M. Epstein  
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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list by United States Mail, first class, postage prepaid, and/or by electronic means for all Pacer system participants on this the 31<sup>st</sup> day of May, 2011.

/s/Kevin M. Epstein

Kevin M. Epstein  
Trial Attorney

Label Matrix for local noticing  
0542-5  
Case 10-54343-lmc  
Western District of Texas  
San Antonio  
Tue May 31 09:08:05 CDT 2011

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American Express  
P.O. Box 981540  
El Paso, TX 79998-1540

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Boerne Star Newspaper  
941 N. School  
Boerne, TX 78006-5922

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Nipomo, CA 93444-5649

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Greenbrae, CA 94904-3032

Dreiss Insurance Agency  
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Fire Alarm Control Systems, Inc.  
12961 Park Central  
San Antonio, TX 78216-2092

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19475 E Highway 290  
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Boerne Business Monthly  
107 Shooting Club Rd  
Boerne, TX 78006-5954

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Austin, TX 78734-2798

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Wirenet Solutions PO Box 312507 New Braunfels, TX 78131-2507	Todd A. Prins Prins Law Firm 4940 Broadway, #108 San Antonio, TX 78209-5732	End of Label Matrix Mailable recipients 70 Bypassed recipients 0 Total 70